



**Allied Site Task Force  
Allied Site Remedial Investigation - Concerns and Questions  
May 13, 2008**

We recognize that the intent of the Allied Site Remedial Investigation is to characterize the site and not presume any particular remedy prior to the release of several remedial options to be detailed in a forthcoming Feasibility Study.

We recognize that an interim step prior to release of the Feasibility Study is the development of a Risk Analysis and that the Risk Analysis will consider potential future uses of the site and relate them to cleanup criteria from several government regulatory programs as well as the approved Human Health Risk Assessment and Baseline Ecological Risk Assessment.

We appreciate the EPAs willingness to comply with the Allied Site Task Force request to be "at the table" early in these processes rather than strictly after the release of the Feasibility Study.

We have this list of shared questions. We feel that some of these questions can be addressed during the Allied Site Task Force Meeting on May 15, 2008:

1. It appears that the existing sheet pile wall slows groundwater movement, causing it to mound behind the wall (where a portion is currently collected), but that groundwater is able to move under, around, and through the wall to some degree. Do we understand that correctly?
2. The Allied Site still contributes, or loads, PCBs to Portage Creek based on upstream/downstream sampling. What other contaminants were monitored in this upstream downstream sampling, and how can we review those data?
3. What assurances are there in the data presently published that no contaminated groundwater is going anywhere else but Portage Creek?
4. Do we understand correctly that EPA considers air transport of PCBs via dust to have been adequately managed in the past and that sampling results justify the notion that this transport vector was of minimal regulatory concern during past actions at the site?
5. Have new contaminant level data been collected since 2003? If so, who holds those data, and were they collected based upon an agency approved work plan?
6. What is the status of the Risk Analysis? Will risk be assessed for "uses" aboveground (e.g., onsite and adjacent redevelopment) and below ground (e.g., drinking water)?
7. Will the Proposed Plan be a part of the Feasibility Study or a separate document that is produced after the Feasibility Study is released?
8. Do we understand correctly that all PRP actions at the site to date have been conducted "at their own risk"?

The Allied Site Task Force respectfully asks the USEPA to continue considering community input on potential future use for the Allied Site in the context of the overall development of the Portage Creek/Kalamazoo River corridor. The Allied Site Task Force maintains that, at a minimum, potential uses along the Portage Creek/Kalamazoo River corridor (including the Allied Site) should be of mixed-use type development. This would include:

- Continued residential and enhanced residential uses;
- Neighborhood linear green space, including walking and biking trailways, parks, and other recreational uses;
- Commercial and retail development; and, where appropriate,
- Light industrial development consistent with the uses cited above.

We will continue to work with the City of Kalamazoo and experts to explore the following questions:

9. What data support the notion that the shallow and deep aquifers are separated and do not exchange water and contaminants?
10. Which Allied Site groundwater monitoring wells are in the deeper aquifer, from which the City wellfield draws water?
11. What direction is the groundwater in the deep aquifer underneath the Allied Site moving?